



EUROPEAN COMMISSION

DIRECTORATE-GENERAL FOR INTERNAL MARKET, INDUSTRY, ENTREPRENEURSHIP
AND SMES

The Director-General

Brussels
GROW.I.1/HCV/srm

Mrs Monica Verbeek
PhD Executive Director
Seas At Risk

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Dear Ms Verbeek,

Thank you for your letter and for sharing with our services the paper discussing existing and emerging alternatives to mining, published by Seas at Risk.

The EU commitments for reaching climate neutrality by 2050, alongside with the green and digital transition, require significant inputs of raw materials.

The European Green Deal recognises clearly this reality - *Access to resources is also a strategic security question for Europe's ambition to deliver the Green Deal. Ensuring the supply of sustainable raw materials, in particular of critical raw materials necessary for clean technologies, digital, space and defence applications, by diversifying supply from both primary and secondary sources, is therefore one of the pre-requisites to make this transition happen.*

As part of the Green Deal package¹, to tackle the challenges related with security and sustainability of supply and resource efficiency, the Commission adopted substantial and robust policies. These include the European Industrial Strategy, the Circular Economy Action Plan, the Zero Pollution Action Plan and the Critical Raw Materials Communication.

In view of achieving resource efficiency, the European Commission launched the Sustainable Product Initiative². The batteries regulation proposal³ includes recycling efficiency and recovery targets and responsible sourcing measures.

¹ [A European Green Deal | European Commission \(europa.eu\)](https://ec.europa.eu/eu-press/european-green-deal)

² https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12567-Sustainable-products-initiative_en

³ https://ec.europa.eu/commission/presscorner/detail/en/ip_20_2312

The European Commission is well aware that despite all measures to accelerate resource efficiency and circularity, society will still need primary raw materials at least for the coming decades, if we want to achieve climate neutrality. For this reason, the European Commission has also adopted measures in view of achieving a secure and sustainable supply of raw materials, as those in the action plan for critical raw materials⁴.

In the critical raw materials action plan, the European Commission includes actions to improve environmental and social sustainability of extraction, not just in the EU, but also globally.

Finally, the European Commission is following closely the ongoing process at the International Seabed authority (ISA) to develop the regulations for exploitation of the mineral resources in the Area (the “mining code”). In line with the precautionary principle and the ecosystem-based approach, the EU advocates that marine minerals cannot be exploited before the effects of deep-sea mining on the marine environment, biodiversity and human activities have been sufficiently researched, the risks understood and the technologies and operational practices able to demonstrate no serious harm to the environment. In that context, the European Commission is also contributing to the stakeholders consultation launched by the ISA on the standards and guidelines for deep-sea mining, to ensure that environmental concerns are well catered for should this activity develop.

Yours sincerely,

(e-signed)
Kerstin Jorna

(e-signed)
Charlina Vitcheva

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Veronica Manfredi, Peter Handley, Felix Leinemann, Raphael
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⁴ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020DC0474&from=EN>